

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

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|----------------------------|---|------------------------------------|
| IN RE: |) | |
| |) | |
| DARRELL WAYNE REED, |) | CASE NUMBER: 17-72264-PWB-7 |
| |) | |
| Debtor. |) | |

**JOINT MOTION FOR EXTENSION OF TIME
FOR FILING AN OBJECTION TO DISCHARGE**

COMES NOW SYNOVUS BANK, A GEORGIA BANKING CORPORATION, FORMERLY KNOWN AS BANK OF NORTH GEORGIA, A DIVISION OF SYNOVUS BANK, A GEORGIA BANKING CORPORATION (the “Creditor”), Darrell Wayne Reed (“Debtor”), by and through the undersigned counsel, along with the Trustee assigned to this matter (the “Trustee”), and pursuant to Rule 4004(b)(1) of the Federal Rules of Bankruptcy Procedure, file this Joint Motion for Extension of Time for Filing an Objection to Debtor’s Discharge (the “Motion”). The good cause warranting this Motion is as follows.

1. On December 29, 2017, Debtor filed a Chapter 7 bankruptcy petition with this Court. Pursuant to Rules 2002, 9007 and 901(b) of the Federal Rule of Bankruptcy Procedure, Creditor filed a Notice of Appearance and Demand for Service of Papers on January 16, 2018.

2. The first Section 341(a) Meeting of the Creditors was held on January 23, 2018 (the “First Meeting”). At the First Meeting, Creditor requested to obtain additional documentation and information requested from Debtor. Debtor recently turned over additional information that Creditor needs time to review.

3. Pursuant to Rule 4004(a) of the Federal Rules of Bankruptcy Procedure, a motion “...objecting to the debtor's discharge shall be filed no later than sixty (60) days after the first date

set for the meeting of creditors under §341(a).” Debtor’s First Meeting was set for January 23, 2018. On March 26, 2108, a Joint Motion for Extension of Time for Filing an Objection to Discharge was filed with this Court [Dkt. 16], whereby, this Honorable Court entered that certain Consent Order dated March 29, 2018 extending the objection to discharge deadline to May 1, 2018 [Dkt. 18]. Therefore, any timely objections to discharge must be filed on or before May 1, 2018 (the “Deadline”).

4. According to Rule 4004(b)(1) of the Federal Rules of Bankruptcy Procedure, a party in interest may file a motion for cause to extend the time to object to discharge, so long as the motion is filed “...before the time has expired.”

5. Creditor is a party in interest.

6. Creditor now timely files this Motion and shows cause for an extension because Debtor recently turned over additional information to Creditor that was requested at the First Meeting, and Creditor needs additional time to determine if an objection to Debtor’s discharge is warranted at such time because of discrepancies in Debtor’s income set forth in his schedules and his tax returns.

WHEREFORE, PREMISES CONSIDERED, Creditor prays this Court finds, determines, and concludes, after notice and opportunity for a hearing has been afforded, that the Creditor be granted an extension of the Deadline to June 30, 2018 to address the discrepancies in Debtor’s income set forth in his schedules and his tax return in order to properly file an objection to Debtor’s discharge, if necessary.

[SIGNATURE PAGE TO FOLLOW]

Dated this 1st day of May, 2018.

Respectfully submitted,

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By: /s/ Erin Stark Brown
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By: /s/ S. Gregory Hays
S. Gregory Hays

CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2018 I electronically filed a true and correct copy of the **JOINT MOTION FOR EXTENSION OF TIME FOR FILING AN OBJECTION TO DEBTOR'S DISCHARGE** with the Clerk of the United States Bankruptcy Court for the Northern District of Georgia (Atlanta) by using the CM/ECF system, and I furnished a copy of the foregoing document(s) to the following parties in the manner of service indicated below:

/s/ Erin Stark Brown
Erin Stark Brown

Via the CM/ECF system which will send a Notice of Electronic Filing to:

DEBTOR'S COUNSEL:
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Via First Class Mail Postage Prepaid to:

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